

HIDDEN: The History of Identity Documentation in European Nations, COST Action CA21120

The HIDDEN Toolkit for Historians navigating GDPR, ethical considerations and big data



Edited by Jennifer Redmond (Maynooth University and Chair, HIDDEN COST Action CA21120) and Aisling Shalvey (University College Cork and Vice Chair, HIDDEN COST Action CA21120)

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The participants, and the contributing authors of this document are the following (appearing alphabetically by **surname**): Isabel Arce Zelada (University College Dublin); Jennifer Brady (Maynooth University); Chiara Candaele (Huygens Institute - Royal Netherlands Academy of Arts and Sciences); Victoria Coccozza (University of Strathclyde); Yvette dos Santos; Samarjit Ghosh (Özyeğin University); Dagmar Hovestadt (NUI Galway); Paula Jones (University of Strathclyde); Adrienn Kovacs (Maynooth University); Megan McAuley (Maynooth University); Declan Monaghan (Maynooth University); David Murphy (Data Protection Commission, Ireland); Ciaran Quinn (Maynooth University); Jennifer Redmond (Maynooth University); Miriam Ryan (Maynooth University); Pedro de Sa (Catholic Archdiocese of Dublin) ; Beatrice Scutaru (Universitat Autònoma de Barcelona); Aisling Shalvey (University College Cork).



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The HIDDEN Toolkit for Historians navigating GDPR, ethical considerations and big data

Introduction

The HIDDEN COST Action network (CA21120) brings together researchers with quantitative and qualitative expertise, legal and human rights experts, theorists and those who are skilled in conducting empirical research with migrants and vulnerable groups as well as historians. Established in 2022, it has grown to be a network of academics across Europe interested in issues related to the past, present and future of identity documentation.

[HIDDEN](#) stands for the History of Identity Documentation in European Nations and is a network of over 200 academics across the EU and its partner countries who are all interested in the past, present and future ways that identity documents shape our lives. This is most apparent when we travel or migrate, but there are also ways in which ID (identity documentation) impacts our experiences in our daily lives. In the context of UN Sustainable Development Goal 16.9 that everyone should have a legal identity by 2030, and the rise of new forms of biometric digital ID, such as the Covid-19 vaccination certificates, it is timely that an interdisciplinary and multidisciplinary group of scholars critically examine the antecedents of modern systems and contemporary practices which can increase societal inequalities.

We are funded by [COST](#) (European Cooperation in Science and Technology) which is part of the EU funding programme for research in Europe. This is a networking grant that brings researchers together over a four-year period (2022-26) in which we share our own research and liaise and listen to those in the NGO/advocacy sector as well as policy makers and those with lived experience of the issues we are examining.

The Chair of the network, called an Action, is [Dr. Jennifer Redmond of Maynooth University](#), Ireland who developed the network based on her historical research on identity documentation used in the Second World War period and who has experience

in conducting oral histories in her work on gender and social history in Ireland. Ethical concerns were at the heart of the Action's proposal in bringing in the voices of those with lived experiences to the research, publication and events of the network. Ethics also arises in the examination of archives related to personal experiences of migration, statelessness and refugee status in the past as they contain personal information.

The Action is led by Jennifer and the Core Group, a team of academics who lead each of the working groups in the network.

We have five thematic working groups that address different aspects of how this happens:

- WG1 Geography as Fortune
- WG2 Documents as Proof, Documents as Past
- WG3 Accessing citizenship
- WG4 Losing citizenship
- WG5 Human Stories for Humane Reactions

An additional group, WG6 directs the dissemination and communications of the network.

The Training School

The HIDDEN Training School on Historians, GDPR, ethical considerations and big data was led by [Working Group 2: Documents as Proof, Documents as Past](#), as one of the last outputs of the network in Year 4.¹ Our aim from the beginning of the network was to better understand cutting edge interpretations of GDPR issues and ethical considerations of big data, and this continued with a dedicated Training School with leading stakeholders in June 2026. The participants learned from each other, guided by a range of experts in the field, including scholars, data protection specialists, librarians and archivists.

¹ For a blog entry on the Training School see <https://hidden-costaction.eu/hidden-training-school-historians-gdpr-ethical-considerations-and-big-data/>

The historical preservation/digitization of IDs and national databases (e.g., [the Irish Censuses](#), the [1939 National Register in Britain](#)) has proven key to explorations of family histories but also plays a major role in establishing lineage in cases of contested citizenship. These digital resources have been essential for scholars of demography and migration, as well as family genealogies. The recent EU [General Data Protection Regulation](#) (GDPR) has impacted on scholarly studies of past personal data and citizens trying to establish family histories. This Training School included GDPR expert, Deputy Commissioner David Murphy, from the Data Protection Commission, the Irish supervisory authority responsible for monitoring the application of the General Data Protection Regulation (GDPR), an independent, internationally respected and trusted supervisor and enforcer of EU data protection law. Training included reflections on ethical use of personal data (biometric and heritage) and its reverberation across different types of public documents and archives. The School aimed to develop key transferable skills of early career researchers and in the HIDDEN network and this document is designed to share that knowledge. While it is not a comprehensive guide to navigating GDPR issues in research, we hope it is a useful entry point to the topic.

What is GDPR?

GDPR, or General Data Protection Regulation, [is a European Union \(EU\) regulation](#). Though it was drafted and passed by the European Union (EU), it imposes obligations onto organizations anywhere, so long as they target or collect data related to people in the EU.² It replaced previous data protection legislation for a number of reasons. Giving your personal data in exchange for the provision of goods and services is how many organisations function. However, this personal data is not only of value to organisations, but also of value to criminals. Personal data breaches have led to high

² See <https://gdpr.eu/what-is-gdpr/> for more details (Accessed 19th August 2026).

levels of crime such as identity theft and fraud that cause distress and financial harm to individuals. Breaches also damage consumer confidence in the organisations involved. The GDPR entered into force in 2016 after passing European Parliament, and as of May 25, 2018, all organizations were required to be compliant.

Under the GDPR, individuals have the following rights:

1. The right to be informed;
2. The right of access;
3. The right to rectification;
4. The right to erasure;
5. The right to restrict processing;
6. The right to data portability;
7. The right to object;
8. Rights in relation to automated decision making and profiling³

By imposing higher standards of personal data protection on organisations and strengthening individual rights, GDPR hopes to ease consumer concerns and give individuals more confidence that their data will be kept secure. Ethical use of source material and GDPR regulations are something all scholars need to be cognisant of. The Training School, and this Toolkit that has emerged from it, aimed to equip participants with the skills they need to navigate access to archives and big data sets in an appropriate and ethical manner.

This document aims to be a short but practical introduction to the range of issues that might need to be considered if a scholar is undertaking research with records that contain personal data, or creating research material (surveys, focus groups or

³ From Irish Universities Association website, <https://www.iua.ie/privacy-policy-cookies/iua-gdpr/> (Accessed 20th August 2026).

interviews, for example) in which ethical considerations on data protection or data storage must be taken into account. The resources indicated in this Toolkit also may be useful when applying for grants, designing research projects or preparing for teaching. For further support on ethical approaches to research projects that contain a qualitative component, see the [The HIDDEN Toolkit Tackling Ethical Concerns in Migration Research](#). In any event, all researchers should check with their affiliated institution for ethical approval and GDPR policies.

Key Terms – definitions from the Data Protection Commission

Personal data: The term ‘personal data’ means any information concerning or relating to an living person who is either identified or identifiable (such a person is referred to as a ‘data subject’). An individual could be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (such as an IP address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

Processing: The term “processing” refers to any operation or set of operations performed on personal data. Processing includes storing, collecting, retrieving, using, combining, erasing and destroying personal data, and can involve automated or manual operations.

Data Protection Commission: The “Data Protection Commission” was established by the Data Protection Acts 1988 to 2018 (‘the Data Protection Acts’). Under the GDPR and the Data Protection Acts, the Commission is responsible for monitoring the application of the GDPR in order to protect the rights and freedoms of individuals in relation to processing. The tasks of the Commission include promoting public awareness and understanding of the risks, rules, safeguards and rights in relation to processing; handling complaints lodged by data subjects; and cooperating with (which includes sharing information with) other data protection authorities in other EU member states.

Data Controller: A “data controller” refers to a person, company, or other body which decides the purposes and methods of processing personal data.

Data Processor: A “data processor” refers to a person, company, or other body which processes personal data on behalf of a data controller.

Consent: Some types of processing are carried out on the basis that you have given your consent. Under the GDPR, consent to processing must be freely given, specific, and informed. You cannot be forced to give your consent, you must be told what purpose(s) your data will be used for, and you should show your consent through a ‘statement or as a clear affirmative action’ (e.g. ticking a box). Consent is not the only lawful basis on which your personal data can be processed (see [Data Commission website for more on this point](#)).

Profiling: Profiling is any kind of automated processing of personal data that involves analysing or predicting your behaviour, habits or interests.

Special categories of personal data: Certain types of sensitive personal data are subject to additional protection under the GDPR. These are listed under Article 9 of the GDPR as “special categories” of personal data. The special categories are: Personal data revealing racial or ethnic origin; Political opinions; Religious or philosophical beliefs’ Trade union membership; Genetic data and biometric data processed for the purpose of uniquely identifying a natural person; Data concerning health; Data concerning a natural person’s sex life or sexual orientation. Processing of these special categories is prohibited, except in limited circumstances set out in Article 9 of the GDPR.

Data Protection Officer (DPO): The GDPR requires data controllers and data processors to appoint a Data Protection Officer (DPO) in certain circumstances. A data controller can also voluntarily decide to appoint a [DPO](#).

Source: <https://www.dataprotection.ie/en/individuals/data-protection-basics/definition-key-terms#Definition> (accessed 25th August 2026).

Relevant laws or legal documents

- Irish Data Protection Commission [Homepage](#) | [Data Protection Commission](#) and guidance documents [DPC Guidance](#) | [Data Protection Commissioner](#)
- European Data Protection Board: [Guidelines 1/2026 on processing of personal data for scientific research purposes](#) | [European Data Protection Board](#) (includes Health research)
- Information Commissioner's Office (UK); What are the research provisions? <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/the-research-provisions/what-are-the-research-provisions/>
- The Maternity Protection, Employment Equality and Preservation of Certain Records Act 2024
<https://www.irishstatutebook.ie/eli/2024/act/37/enacted/en/html>
- Agencia española protección datos (2019) [A Guide to privacy by design](#)
- Agencia española protección datos (2020), [Guidelines for Data Protection by Default](#)
- Agencia española protección datos (2026), [AI Voice transcription: Implications for data protection](#)
- Agencia española protección datos (2026), [AI Voice Transcription \(II\): accountability, rights and transparency](#)
- Data protection guidance from the National Archives Ireland:
<https://nationalarchives.ie/government-services/data-protection-and-the-national-archives-act/>
- Irish Data protection commission guidance on redacting documents:
<https://www.dataprotection.ie/en/dpc-guidance/redacting-documents-and-records>
- Irish data protection commission guidance on anonymisation and pseudoanonymisation:
<https://www.dataprotection.ie/sites/default/files/uploads/2022-04/Anonymisation%20and%20Pseudonymisation%20-%20latest%20April%202022.pdf>
- **Portugues information about GPDR**
- [Lei que assegura a execução do RGPD em Portugal](#)
- Santa Casa da Misericórdia (The biggest charity institution in Portugal) [Política de Privacidade - Santa Casa da Misericórdia de Lisboa](#)
- **French legal information about GPDR**

- [Traitements de données à des fins de recherche scientifique \(hors santé\) : quand saisir la CNIL ? | CNIL](#)
 - [Recherche scientifique et RGPD : quelles règles pour utiliser les données personnelles ? - SILEXO](#)
 - [La réutilisation des archives publiques \(FranceArchives\)](#)
 - [Homepage | CNIL](#)
 - [Recherche scientifique et RGPD : quelles règles pour utiliser les données personnelles ? - SILEXO](#)
 - [LOI n° 2018-493 du 20 juin 2018 relative à la protection des données personnelles \(1\) - Légifrance](#)
 - [Le RGPD et les archives | Droit\(s\) des archives](#)
-
- **German Information**
 - Constitutional court verdict on right to informational self-determination from 1983 (English Version)
https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/1983/12/rs19831215_1bvr020983en.html
 - Stasi Records Act (version 2022)
<https://www.bundesarchiv.de/en/stasi-records-archive/legal-basis/>
 - Deutsche Forschungsgemeinschaft (DFG – German Research Council), statement on research and AI
<https://www.dfg.de/resource/blob/289674/ki-230921-stellungnahme-praesidium.pdf>

Useful guidelines by professional bodies/organisations

In alphabetical order:

- Australian Society of Archivists, 'The Archivist's Mission'
<https://www.archivists.org.au/Web/Web/Careers/The-Archival-Profession.aspx>
- National Records of Scotland, Research Use of Personal Data in Archival Records
<https://www.nrscotland.gov.uk/publications/research-use-of-personal-data-in-archival-records/>
- QUB School of History, Anthropology, Philosophy and Politics: GDPR and Research Ethics
<https://www.qub.ac.uk/schools/happ/subject->

[area/history/research/ethics/GDPRandResearchEthics/#what-are-gdpr-safeguards-1012064-1](#)

- Royal Historical Society, Data Protection and Historical Research: The Basics
<https://blog.royalhistsoc.org/2021/04/12/data-protection-and-historical-research-the-basics/>
- Royal Historical Society, Data Protection and Historians in the UK
https://files.royalhistsoc.org/wp-content/uploads/2020/07/19092331/20200707_RHS_Data_Protection_Historians_WEB2.pdf
- Society of American Archivists, Dataverse: Data Sets on Archives
<https://www2.archivists.org/saa-dataverse>
<https://dataverse.unc.edu/dataverse/saa>
- Society of American Archivists, Glossary of Archival Terms
<https://www2.archivists.org/glossary/terms>
- University of Strathclyde Ethics Committee
<https://www.strath.ac.uk/research/researchknowledgeexchangeservices/universityethicscommittee/>
- The Irish Humanities Alliance, Royal Irish Academy, Research Ethics and Integrity Working Group
<https://www.irishhumanities.ie/working-groups/research-ethics-and-integrity>
- [The Research Integrity & AI Working Group](#)
Aims to respond to the role of AI in humanities research, including copyright and publishing, research ethics review processes within and beyond the university, and ethics and integrity training for graduate students.
- Uncovering Childhoods: Accessing Archival Material for Projects Focused on Twentieth Century British History
<https://www.history.ox.ac.uk/article/uncovering-childhoods-accessing-archival-material-for-projects-focused-on-twentieth-century>
- University of Strathclyde, Code of Practice in Investigations Involving Human Beings
https://www.strath.ac.uk/media/ps/rkes/Code_of_Practice_eighth_Feb17.pdf

Data Management Plans:

- **Challenging Research Network**
<https://challengingresearch.org/>

A UK-based network and support group for scholars from the humanities doing ethically challenging research.

- **Ciaran Quinn, Why Manage Research Data? - Research Data Management - LibGuides at National University of Ireland, Maynooth**
<https://nuim.libguides.com/RDM>
- **Consorti de Serveis Universitaris de Catalunya, Data Management Plans: Version 3** (June 2019)
<https://hdl.handle.net/2072/357988>
- **Consorti de Serveis Universitaris de Catalunya, Research Data Management**
<https://www.csuc.cat/en/serveis/gestio-de-dades-de-recerca>
- **Royal Dutch Historical Society (KNHG), Ethical Code for Historians** (revised 2025, in Dutch)
<https://knhg.nl/nl/beroepspraktijk/ethische-code>
- **SAA Dictionary of Archives Terminology, Definition of ‘Sensitive’**
<https://dictionary.archivists.org/entry/sensitive.html>
- **UAB, Guide to Create a Data Management Plan for PhD Students** (in Catalan)
- **UPF, Video on How to Create a Data Management Plan for PhD Students** (in Catalan)

If you are combining this with your previous list into a single bibliography, I can also sort the entire combined list A-Z in a consistent citation style.

Secondary sources

Some resources are not in English, but many can be translated on their publisher's website. Harvard style references have been used in this list:

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https://www.edps.europa.eu/data-protection/our-work/subjects/rights-individual_en#:~:text=The%20GDPR%20has%20a%20chapter,decision%20based%20solely%20on%20automated
- Data Protection Commission <https://www.dataprotection.ie/en>
- Irish Universities Association GDPR site <https://www.iua.ie/privacy-policy-cookies/iua-gdpr/>
- Academic Integrity and Data Protection, guidelines from Maynooth University Library <https://nuim.libguides.com/AcademicIntegrity/DataProtection>
- For scholars doing research on children's history, adoption, institutional care, etc. that address legal and ethical challenges connected to these topics
<https://oorlogvoorderechter.nl/about-the-project/>
- English information about the 'Oorlog voor de Rechter' project ('War in Court') of the National Archives of the Netherlands. This project is coordinating the digitisation and opening of the Central Archives of the Special Jurisdiction (CABR), the largest and most important archive concerning WW2 collaboration with the German Occupation in the Netherlands. These archives have been made publicly accessible in 2025 and contain personal data of more than 200.000 persons. There is also a huge on-going societal debate about these archives. The records were supposed to become digitally accessible in 2025, but this has been postponed due to concerns from some affected families.
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